

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Case No. 24-cr-156 (4) (SRN/TNL)

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United States of America,

Plaintiff,

v.

**DEFENDANT BURRELL'S  
TRIAL BRIEF**

Michael Allen Burrell,

Defendant.

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In response to the Court's Order directing parties to file a trial brief (ECF 220), we respectfully offer the following:

1. Trial Counsel: Mr. Burrell will be represented at trial by the undersigned counsel.
2. Trial Length: The defense anticipate that trial of this matter shall take, at most, 5 weeks.
3. Unresolved Issues: Defendants have filed joint motions respecting closure of the courtroom, use of an anonymous jury, shackling defendants during trial and early access to juror questionnaires. See ECF 245-48. The grounds for the requested relief are set forth in each motion, as well as in the trial brief filed by codefendant Solomon (ECF 255), all of which are adopted and incorporated herein.
4. Motions in Limine. To avoid unnecessary duplication and the filing of repetitive pleadings, Mr. Burrell has filed a motion (ECF 257) to join in the motions in limine filed by codefendant Solomon (ECF 249-54). If the Court prefers, Mr. Burrell

stands ready to file separate motions instead of the requested joinder.

Dated: July 26, 2024

Respectfully submitted,

*s/Steven E. Wolter*

Steven E. Wolter, #170707

KELLEY, WOLTER & SCOTT, P.A.

Centre Village Offices

431 South 7<sup>th</sup> Street, Suite 2530

Minneapolis, MN 55415

(612) 371-9090

[swolter@kelleywolter.com](mailto:swolter@kelleywolter.com)

Attorney for Defendant